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9 *Designated for service pursuant to LR IA 11-1(b)*

10 *Attorneys for Plaintiff Thomas Brown*

11
12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14
15 THOMAS BROWN, an individual,

16 Plaintiff

17 vs.

18 AUTOMOBILI LAMBORGHINI
19 AMERICA, LLC, a Delaware limited liability
20 company; FINDLAY DIGUILIO, LLC, d/b/a
LAMBORGHINI LAS VEGAS, a/k/a A
Findlay Automotive Property,

21 Defendants

Case No. 2:23-CV-1415-CDS-BNW

**JOINT STIPULATION AND ORDER TO
EXTEND THE DEADLINE TO RESPOND
TO DEFENDANTS' MOTION TO
DISMISS PLAINTIFF'S MAGNUSON-
MOSS WARRANTY ACT AND BREACH
OF EXPRESS WARRANTY CLAIMS**

(SECOND REQUEST)

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25 IT IS HEREBY STIPULATED AND AGREED, by Plaintiff Thomas Brown
26 ("Plaintiff"), and Defendant Automobili Lamborghini America, LLC ("ALA"), Defendant
27 Findlay Diguilio, LLC d/b/a Lamborghini Las Vegas, a/k/a A Findlay Automotive Property
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(“LVV”) (collectively, “Defendants”), through their respective counsel, that the time for Plaintiff to respond to *Defendants’ Motion to Dismiss Plaintiff’s Magnuson-Moss Warranty Act and Breach of Express Warranty Claims* (“Defendants’ Motion to Dismiss”) be extended up to and including January 31, 2024. Plaintiff’s current deadline to respond to Defendants’ Motion to Dismiss is November 8, 2023. The parties have agreed to engage in alternative dispute resolution. The additional time stipulated to herein will allow the parties to engage in alternative dispute resolution and thereby potentially bring an early resolution of the claims in this case.

The reason for the extension is not for purposes of delay or to cause prejudice to any party, but to allow the parties to continue to discuss settlement options. This is the parties’ second request for such an extension from the Court. This request complies with Local Rules IA 6-1, IA 6-2, and 7-1.

DATED this 3rd day of November, 2023.

RAY QUINNEY & NEBEKER P.C.

SNELL & WILMER L.L.P.

/s/ Z. Ryan Pahnke

/s/ Dawn L. Davis

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Lamborghini America, and Findlay

Designated counsel pursuant to LR IA 11-1(b)

DiGuilio, LLC dba Lamborghini Las Vegas

ORDER

IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE

Dated November 6, 2023